

Page 4301

1 specificity what it was that you used in calculating
2 the information that's actually on the chart. So
3 that -- for instance, what's the length of time that
4 was used in creating the chart? You'd mentioned at
5 some point that it was a three-month period?

6 A. [THOMAS MAGUIRE] Yes, May through June. Do
7 you want to know the numbers that are behind the
8 bar?

9 Q. Yes, basically.

10 CHAIRMAN CONNELLY: That's something you
11 can give us now?

12 WITNESS THOMAS MAGUIRE: Yes.

13 A. [THOMAS MAGUIRE] Receipt to appointment for
14 retail was 28 hours. Receipt to dispatch for retail
15 was 17 hours. Receipt to clear was 22 hours.

16 Receipt to appointment for a --

17 CHAIRMAN CONNELLY: You're going down to
18 wholesale?

19 A. [THOMAS MAGUIRE] Receipt to appointment for
20 wholesale was 25 1/2. Receipt to dispatch for
21 wholesale was 19 hours. Receipt to clear for
22 wholesale was 41 hours.

23 Q. And if I were to turn to the carrier-to-
24 carrier guidelines that have been provided for the

Page 4303

1 and we went into the NORD system and asked them for
2 that information. Then we turned around and said,
3 okay, maybe we're dispatching out later and that's
4 driving the extended interval, so we asked what's
5 the average time between when we receive a trouble
6 and we dispatch a trouble.

7 Within that big span of time from read
8 to clear there's other things that happen, and
9 depending on what report we might ask, we could
10 possibly go in there and pull some of this
11 information out.

12 MR. McDONALD: All that having been
13 said, I guess I would just renew my request to
14 actually find out the background data that was used
15 to calculate this specifically.

16 MS. CARPINO: We'll make that proposed
17 Record Request F.

18 (RECORD REQUEST.)

19 MR. ROWE: Ms. Carpino, there may be
20 proprietary concerns in that data. We'd certainly
21 be happy to furnish the Commission with what it
22 asked for, but we would not furnish the information
23 to any other CLEC.

24 MS. CARPINO: We'll take a look at it.

Page 4302

1 period covered by this, I'd be able to find those
2 numbers someplace in there?

3 A. [THOMAS MAGUIRE] No, I'd find receipt to
4 clear as MTTR. The customers are not carrier-to-
5 carrier numbers. As I described them earlier, MTTRs
6 is mean time to restore, so how long it takes us
7 from the receipt of the trouble to the time that the
8 trouble is resolved. So inside that, inside that
9 window, different things take place. Traditionally,
10 going back to the days of LMOS, the LMO system, we
11 used to track things like how long it took to test.
12 This is before a lot of the mechanization came into
13 place. So they used to have metrics like receipt to
14 test, receipt to screen, just to make sure that we
15 were trying to get things done as expeditiously as
16 possible.

17 So while we were looking at the MTTR to
18 try to figure out what was driving the delta between
19 retail and wholesale, I wanted to make sure, for
20 example, that we weren't giving out different
21 appointments outside to the wholesale people as
22 opposed to the retail people. So we started looking
23 at what's the average interval from receipt to when
24 the appointment was established? And so we went out

Page 4304

1 MR. ROWE: Thank you.

2 MS. CARPINO: Should we decide to
3 forward the request on.

4 Ms. Lichtenberg?

5 MS. LICHTENBERG: Just a couple of
6 questions for those of us who are mathematically
7 disadvantaged.

8 CROSS-EXAMINATION

9 BY MS. LICHTENBERG:

10 Q. The X axis is how long?

11 A. [THOMAS MAGUIRE] In this particular --

12 Q. On this Page 3.

13 A. [THOMAS MAGUIRE] If I said it was 41 hours,
14 I would imagine -- if the receipt-to-clear for
15 wholesale was 41 hours, the X axis is pretty close
16 to 41 hours.

17 Q. So this bottom X axis is 41 hours.

18 A. [THOMAS MAGUIRE] I think you're missing the
19 point. The graphic is for illustrative purposes
20 only. It's not -- it's just to show that there's a
21 difference between the results. I didn't put
22 together a standard, you know, how many hours across
23 the bottom and another variable across the Y axis.
24 I just wanted to put this together just as a graphic

Page 4305

1 so we'd understand what was there. Having said
2 that, 41 is a good number.

3 Q. But the graphic was created using some sort
4 of numeric data; correct?

5 A. [THOMAS MAGUIRE] Yes.

6 Q. And again, was there any residential data
7 included?

8 A. [THOMAS MAGUIRE] Possibly. I didn't
9 differentiate by class of service.

10 Q. Now I'm confused again. You told me neither
11 UNE-P nor resale was covered on this. So would it
12 be residential T1 users or --

13 A. [THOMAS MAGUIRE] There's UNE loops that go
14 to residential.

15 Q. So there is some residential data in terms
16 of UNE loops.

17 A. [THOMAS MAGUIRE] Yes.

18 Q. And if I were to look at your 28 hours for
19 retail from receipt to appointment and then the 22
20 hours receipt to clear, that's after the 28 hours
21 when I got my appointment it took me 22 hours to
22 clear it?

23 A. [THOMAS MAGUIRE] No.

24 Q. I'm sorry; I'm confused.

Page 4307

1 to factor out the no-access rate in terms of how
2 many of these troubles actually required access
3 other than to Verizon-owned facilities.

4 A. [THOMAS MAGUIRE] No. That wasn't the
5 intent of the chart.

6 Q. So that when you talk about no access, it is
7 for those troubles where there was some need for
8 access.

9 A. [THOMAS MAGUIRE] Yes.

10 Q. So it is some subset.

11 A. [THOMAS MAGUIRE] Yes.

12 MS. LICHTENBERG: Thank you.

13 WITNESS THOMAS MAGUIRE: For
14 clarification purposes, when I send the electronic
15 copies, I will call the first chart Page 1,

16 Maintenance Variables, I'll call the second chart

17 Page 2, and I'll entitle it Maintenance Variables

18 Including Line Share; and then Page 3 will remain as

19 Race to Resolution -- just for clarification

20 purposes.

21 CHAIRMAN CONNELLY: That shouldn't

22 disturb anyone reading this, as I remember the

23 transcript. You'd make no other changes in it.

24 MS. CARPINO: Thank you. Is there

Page 4306

1 A. [THOMAS MAGUIRE] If you look at the Y axis,
2 the Y axis is when we received the trouble. This is
3 a combination of bar chart, Gantt chart, PERT chart.

4 Again, it's a graphic; it's not something that I'm
5 looking to put exact times on it. But be that as it
6 may, if you look at the Y axis, you could say that
7 is when we received all the troubles. So, for
8 example, the Y axis is today at noon, and if you
9 looked at the retail appointment that was given, it
10 would be 28 hours from noon, so 4:00 o'clock
11 tomorrow afternoon. If you looked at the receipt to
12 dispatch, it would only be 17 hours from noon. If
13 you looked at receipt to clear, it would be 22 hours
14 from noon -- and so on.

15 Q. And when you say dispatch, do you mean
16 solely dispatch to the customer premise, or do you
17 include dispatch any other -- into the central
18 office, out of the central office? What is the
19 definition of dispatch?

20 A. [THOMAS MAGUIRE] I believe it's just
21 dispatch. It's dispatch in, dispatch out. It's
22 just set up and dispatched out. It's dispatched to
23 a technician.

24 Q. So there is no way, I guess, with this data

Page 4308

1 anything further? Does the Bench have any
2 questions? Hearing none, let's move along to Mr.
3 Oxman's witnesses. Would you like to introduce your
4 witnesses for us?

5 MR. OXMAN: Thank you, Ms. Carpino.

6 Jason Oxman on behalf of Covad Communications. I'm
7 joined today by Minda Cutcher, vice-president of
8 ILEC relations, based here in Massachusetts; John
9 Berard, director of ILEC relations for Covad, also
10 based here in Massachusetts; and Michael Clancy,
11 director of ILEC relations, based in New York. The
12 panel is assembled to address issues related to DSL
13 loops, and with the permission of the Bench, we
14 would like to make a brief opening statement.

15 MS. CARPINO: Why don't we first
16 introduce all the witnesses and I'll swear in the
17 witnesses that haven't already received the oath.

18 MS. SCARDINO: Before we proceed, it was
19 my understanding that we were going to have the Bell
20 Atlantic panel do the DSL, their testimony that they
21 had on DSL loops, before the CLEC panel. Or are we
22 proceeding with the CLEC panel first?

23 MS. CARPINO: We're still doing the
24 miscellaneous non-DSL issues. But I'll swear in all

Page 4309

1 the witnesses. If there's no discussion on that,
2 then we'll move along. Ms. Scardino, do you have a
3 witness?
4 MS. SCARDINO: Mr. Williams from Rhythms
5 will be testifying on DSL loop provisioning.
6 MS. CARPINO: Mr. McDonald?
7 MR. McDONALD: Ms. Lichtenberg from
8 WorldCom will be testifying on DSL issues.
9 MS. CARPINO: Are there any other
10 witnesses?
11 Why don't we have all of the witnesses
12 stand.
13 MINDA J. CUTCHER, JOHN BERARD, MICHAEL
14 CLANCY, SHERRY LICHTENBERG, and
15 ROBERT G. WILLIAMS, Witnesses
16 MS. CARPINO: Do you swear or affirm
17 that the testimony you are about to provide is the
18 whole truth?
19 THE WITNESSES: I do.
20 MS. CARPINO: In addition, do you adopt
21 statements you made before this Commission last year
22 in this proceeding on this issue?
23 THE WITNESSES: Yes, I do.
24 MS. CARPINO: Thank you. You may be

Page 4310

1 seated.
2 Do any of the witnesses have statements
3 to make on non-DSL issues?
4 Ms. Reed, do you have any questions to
5 ask of these witnesses?
6 MS. REED: I do not, Madam Hearing
7 Officer.
8 MS. CARPINO: Does Verizon have any
9 questions?
10 MR. ROWE: We do not.
11 MS. CARPINO: The Bench does have a
12 question for Verizon. In response to an information
13 request of WorldCom you indicated that you did have
14 some fiber to the curb with respect to GR-303, and
15 which we weren't sure what "fiber to the curb"
16 meant. Is there one of the witnesses that can
17 answer that?
18 WITNESS WHITE: We have installed some
19 fiber to the curb in Massachusetts, and that is
20 actually the fiber -- we have seen electronics that
21 go to an RT. This is a very small RT that goes
22 right on a pole in front of the customer's house.
23 It serves the customers in that house. The
24 technology was originally deployed with TR 08

Page 4311

1 functionality, and later we upgraded the equipment
2 to GR-303, but we didn't upgrade all of the OSS
3 support of that. So the equipment is capable of
4 handling GR-303, but we don't have all of the
5 functionality and systems work to make it flow
6 through like GR-303.
7 MS. CARPINO: These are all residences
8 or some business --
9 WITNESS WHITE: It's predominantly
10 residential.
11 EXAMINATION
12 BY MS. HONG:
13 Q. I have a couple of questions to Ms.
14 Lichtenberg. Could you turn to your joint
15 declaration, Paragraph 29.
16 A. [LICHTENBERG] Yes.
17 Q. You mentioned Exhibit G that is attached to
18 another joint declaration submitted by MCI; right?
19 A. [LICHTENBERG] Yes.
20 Q. It's about how to unbundle IDLC loops using
21 four methods; right?
22 A. [LICHTENBERG] That's correct.
23 Q. Is that document the same as that MCI
24 submitted to the FCC and the FCC quoted in the UNE

Page 4312

1 remand order? Would you check that?
2 MR. McDONALD: We'll check, and if
3 possible --
4 Q. It's the UNE remand order, Paragraph 217,
5 Footnote 417.
6 MR. McDONALD: Could you just repeat
7 that, please?
8 MS. HONG: Paragraph 217, Footnote 417.
9 MR. McDONALD: We'll respond by the end
10 of the day, if possible; if not, by tomorrow.
11 Q. Regarding unbundling of IDLC loops: Verizon
12 in its supplemental checklist affidavit, paragraphs
13 from 120 to 123, Verizon stated that it requested
14 MCI-W to address specific questions that Verizon
15 submitted to analyze MCI-W's unbundling proposal,
16 but they have not received a detailed proposal. Do
17 you have any updated information on that?
18 MR. McDONALD: I'm not sure that this
19 witness knows the answer to this question, but
20 that's something else that I should be able to check
21 on.
22 (Pause.)
23 MR. McDONALD: Based on a question the
24 Bench asked of Verizon, I believe Ms. Lichtenberg

Page 4313

1 has a question of Verizon.

2 MS. LICHTENBERG: In your answer that
3 there is fiber to the curb in certain areas of the
4 Commonwealth for residential customers, will we be
5 able to offer UNE-P for each of those customers
6 based on fiber to the curb?

7 WITNESS ALBERT: Are you saying UNE-P?
8 Yes.

9 MS. LICHTENBERG: And will you require
10 any unbundling, if you will, of the IDLC circuits,
11 or will you just -- how will you handle the offer of
12 UNE-P?

13 WITNESS ALBERT: If they're to be served
14 with UNE-P, physical facilities that serve them
15 today will continue to serve them as they are.

16 MS. LICHTENBERG: Thank you.

17 MS. CHIN: I have a clarifying question.
18 If we could just go back to the Race to Resolution,
19 Mr. Maguire. The receipt on all this, that's the
20 exact same receipt that we were talking about, where
21 it's resale or wholesale; right? That's the same
22 point in time?

23 WITNESS THOMAS MAGUIRE: Yes.

24 MS. CHIN: So in between that is the

Page 4315

1 trouble you have to give it an appointment.

2 So they're all piece parts of each
3 other. They're not additive. They're not
4 aggregates.

5 Did that help?

6 The purpose of the chart is to show
7 quite simply -- it's not meant -- the reason I
8 didn't put the numbers down is because I didn't want
9 to confuse anybody with the numbers. I just wanted
10 to simply point out, if you looked at --

11 Let's say I had three separate charts
12 and I wanted to compare the appointments, or the
13 receipt to appointment for retail versus wholesale.
14 We'd see two bars next to each other and they'd be
15 pretty close to the same. If I wanted to look at
16 receipt to dispatch, you would have two bars next to
17 each other, and they would look pretty much close to
18 the same. If you looked at receipt to clear, there
19 would be, you know, a dissimilarity between the
20 retail and wholesale.

21 So rather than have three individual
22 charts, I just decided to clump them together, and
23 this is the end result.

24 WITNESS WHITE: The clock is running.

Page 4314

1 appointment, the dispatch, and then the clear?

2 WITNESS THOMAS MAGUIRE: If you're going
3 to put them in chronological order, I would put
4 dispatch before the appointment.

5 MS. CHIN: So just looking at the
6 retail, you've got 22 hours for the receipt to
7 clear. Shouldn't that encompass the appointment and
8 the dispatch?

9 WITNESS THOMAS MAGUIRE: Yes.

10 MS. CHIN: So why is it 22 hours,
11 whereas just receipt to appointment is 28 hours?

12 WITNESS THOMAS MAGUIRE: Look at them as
13 individuals rather than as subsets of each other.
14 So if you were looking at the life of the trouble,
15 typical trouble, you would take it in at Point Zero,
16 and the appointment would be at Point 25, and we
17 would endeavor to dispatch prior to the appointment
18 and fix it prior to the appointment. So that's why
19 I was describing -- maybe I confused people
20 unnecessarily by making them independent charts or
21 independent bars, rather -- because they could be
22 subsets of one another. For this chart, it assumes
23 you have to dispatch in order to clear it and you
24 have to have an appointment, because once you take a

Page 4316

1 We receive a trouble, if we had a wholesale and
2 retail, we dispatch them at the same time. So we're
3 giving equal service when we dispatch. However, if
4 we don't get enough information, if they tell us the
5 trouble is out when it's in, we end up with a double
6 dispatch and it takes longer than it should. If we
7 get out there and we can't get access and we have to
8 go back later in the day, all those things extend
9 the final time.

10 WITNESS THOMAS MAGUIRE: The reason I
11 put Race to Resolution, I was thinking in terms of a
12 horse race. The horses are in the gate. They each
13 represent a trouble. They go off. They know where
14 they have to finish. Their appointment is to go
15 around the track once. They both take off at the
16 same time, they're both running at the same time, it
17 just takes one to get to the gate, coming around the
18 finish line, a little bit longer -- in this case,
19 much longer than the other. So that was the whole
20 conceptual thing I had going there. Does that make
21 sense?

22 CHAIRMAN CONNELLY: Sort of a Guys and
23 Dolls explanation.

24 MS. LICHTENBERG: I am more confused and

Page 4317

1 would like to ask a couple more questions.

2 MS. CARPINO: Ms. Lichtenberg.

3 MS. LICHTENBERG: You said that they're
4 dispatched at the same time. So is there some
5 reason that receipt to dispatch for retail is 17
6 hours but for wholesale is 19 hours?

7 WITNESS THOMAS MAGUIRE: I'm going to
8 reexplain that the way I explained that. Look at
9 them as three individual charts. They're not
10 dispatched at exactly the same time. The purpose of
11 the chart is to show that there's no great
12 difference, looking at these couple of data points,
13 between the dispatch interval, receipt-to-dispatch
14 interval for retail and wholesale. There's a
15 two-hour difference, but I doubt that that two-hour
16 difference is leading to the dissimilarity in the
17 clear times.

18 WITNESS WHITE: You can have examples
19 where you need to dispatch and test with a CLEC and
20 they're not open on Sunday, so we would have to wait
21 to dispatch until Monday. So there are situations
22 where you would have to do it.

23 But that's not the bigger problem. The
24 bigger problem is the information we get doesn't

Page 4319

1 I could certainly, particularly in terms
2 of multiple dispatch -- the more knowledge that I
3 can impart to my own trouble-handling folks about
4 something like multiple dispatch, the more that I
5 can try to cut down on that.

6 CHAIRMAN CONNELLY: Let's go back to
7 first principles. You introduced this chart in
8 order to help the Department improve the record in
9 this case, so that we, the Department, can
10 understand a point that or points you wish this
11 chart to make in discharging our consultative role
12 under 271 with the FCC. So I would suggest that we
13 take under advisement what this lady has said and we
14 will frame, if we deem it meet, a record request
15 that tries to illuminate some of the questions that
16 have arisen. Whether the questions are relevant or
17 not, they still are questions about a chart that you
18 have introduced, and I think there's certainly an
19 incumbency on your part to make your own creature
20 clear to us. So you will hear back from us on that.
21 Thank you -- probably in the form of a record
22 request, but we'll sort that out in accordance with
23 the ground rules.

24 (RECORD REQUEST.)

Page 4318

1 tell us whether to go in or out accurately. The
2 bigger problem is when we get out there the customer
3 didn't expect us, the customer is on vacation.

4 MS. LICHTENBERG: So, again -- maybe if
5 we just had a couple of pieces of information we'd
6 stop getting confused by this thing. Could we
7 possibly get the no-access rate for retail and the
8 no-access rate for wholesale? These are the numbers
9 in the bottom right-hand corner of this third page.

10 The multiple-dispatch number for retail and the
11 multiple-dispatch number for wholesale; and the
12 duration of I-codes for retail and wholesale.

13 WITNESS THOMAS MAGUIRE: Maybe I'm
14 missing something, but I don't know how any of that
15 information would help you understand the chart.

16 MS. LICHTENBERG: Well, you're telling
17 me that my customers have five times the no-access
18 rate, but you're not telling me what the no-access
19 rate is on retail and what makes up that rate and
20 what the no-access rate is on wholesale and what
21 makes up that rate. If I understood that, I could
22 work with my own people to understand how we would
23 better plan for access and work better with Verizon
24 to try to bring down these rates.

Page 4320

1 MS. CARPINO: Before we leave the
2 subject, Ms. Lichtenberg, would you like to
3 summarize again for us that information?

4 MS. LICHTENBERG: Yes. I would like --

5 CHAIRMAN CONNELLY: I think you did
6 already.

7 MS. LICHTENBERG: I think I did.

8 MS. CARPINO: You were able to get it
9 all in?

10 MS. LICHTENBERG: It's just the lower
11 right-hand corner, the numbers that drove that.

12 MR. McDONALD: If the record request
13 that I had posed earlier about getting all the
14 information would answer that question --

15 CHAIRMAN CONNELLY: We will take into
16 account what you asked for, too, in formulating a
17 record request if we deem it to be useful to us.

18 MR. McDONALD: Thank you.

19 CHAIRMAN CONNELLY: I just want to get
20 out of this eddy. This is getting comical.

21 MS. CARPINO: Are there any other
22 questions?

23 I will make a proposed record request as
24 well. I'm interested in CLEC-specific numbers you

Page 4321

1 have for missed repair appointment and mean time to
2 repair from January, 2000 through June, 2000. That
3 will be proposed Record Request H.

4 (RECORD REQUEST.)

5 WITNESS ABESAMIS: I'll check and see if
6 that is available.

7 MS. CARPINO: Shall we move along to DSL
8 issues? There is a presentation?

9 MR. ROWE: Verizon has the same
10 panelists as we did for loops generally. Mr. White
11 has a brief statement with respect to Covad
12 record-request responses received yesterday on which
13 he has been working to develop an understanding and
14 an answer. And Ms. Abesamis has a brief fill-in for
15 her testimony. Page 10, Paragraph 22, regarding due
16 dates requested and due dates offered.

17 AMY STERN, THOMAS MAGUIRE, DONALD
18 ALBERT, JOHN WHITE, and BETH
19 ABESAMIS, Witnesses

20 MS. CARPINO: Mr. White?

21 WITNESS WHITE: Thank you. Late
22 yesterday I received the Covad answers to the DTE.
23 and I want to specifically talk about three. They
24 haven't been fully investigated in the short

Page 4323

1 mean by no-access issues? You mentioned that was 12
2 percent.

3 WITNESS WHITE: We have provided to the
4 CLEC that we went out there and we weren't able to
5 get either to the customer or into the customer's
6 terminal to work on it, and we have notified Covad
7 that they have a no-access condition and they're
8 going to reset up another appointment for us.

9 COMMISSIONER VASINGTON: Thank you.

10 MS. CARPINO: And you will provide those
11 results, of course, to Covad?

12 WITNESS WHITE: Yes, we will. That's
13 the first one.

14 The second one, the Department of
15 Telecommunications and Energy in DTE No. 9 asked for
16 copies of failed loop lists submitted to Bell
17 Atlantic. What I see in this attachment, which is
18 also labeled proprietary, are the lists that we
19 provide Covad, not lists that Covad provides us.
20 It's a snapshot of the order status for each day in
21 the month of July. We generated the list. They are
22 not the final status on those orders, but they
23 provide Covad with a management view, I'll call it,
24 so that they know what we've completed, so that they

Page 4322

1 interval, but I do have some material that shows
2 that they are inaccurate and misleading.

3 The first one is DTE No. 3. You had
4 asked to provide evidence showing that BA has a
5 backlog of Covad orders. The document that was
6 produced was labeled proprietary. I think I'll
7 leave off the quantities and just talk percentages
8 of what I've seen in the document. I think that
9 could be provided.

10 We looked at almost 100 percent of the
11 orders. The work was just finished early this
12 morning. What we found is, of this list, this very,
13 very long list of backlog, 22 percent of them Covad
14 had given us a serial number and counted them as
15 complete. 7 percent had been canceled. 12 percent
16 had no-access issues. 28 percent had been queried
17 back to Covad for errors; they don't even appear to
18 be Massachusetts purchase-order numbers. 31 percent
19 came in and are due since the strike, so I'm hoping
20 that those would not be counted. Which leaves less
21 than 1 percent less the one day's work on the
22 Verizon backlog. That's our analysis so far, and I
23 can provide the detail probably later today.

24 COMMISSIONER VASINGTON: What do you

Page 4324

1 know what is no-access, so that they know what we
2 haven't dispatched on, where it's still in the
3 process of being worked, and they also know where
4 we're having facility problems -- and those facility
5 problems, they would like us to try to continue to
6 work through to see if we could get to resolution.

7 MS. CARPINO: And how often do you
8 provide those, Mr. White?

9 WITNESS WHITE: Every single day those
10 lists are provided. Covad did provide every one for
11 the month of July. They appear, in the limited
12 time, that they are accurate. On those lists you
13 will see completed, no-access, canceled, and you
14 will notice that only 7 percent of the orders were
15 missed, we didn't get out on the appointed due date.
16 At least that was the status as of 4:00 o'clock that
17 night. In some cases we do get out and finish it a
18 little bit later and the statusing hasn't caught up.
19 So these aren't final results.

20 There were 17 percent on that list that
21 were no-access or canceled, which were the ones that
22 go back to Covad for review, to see if they can get
23 access so we can go back on them. And there were 17
24 percent that also had facility problems that we had

Page 4325

1 worked on and we were unsuccessful so far, and in
2 some cases we may fix it later that night or we may
3 go back the next day. We make every attempt to
4 continue to work on the facility problems until we
5 finally say that, no, there are no copper
6 facilities, all these loops have to be on copper.
7 We haven't installed copper in the last ten years,
8 feeding our FIs, our feeder facilities, so finding a
9 good copper pair spare is not easy. So this is an
10 issue with any of the xDSL that requires copper.

11 Those are very typical lists. I
12 certainly would not categorize it as failed-loop
13 issues. This was the process that we agreed and I
14 referenced in my May affidavit and the August
15 supplemental affidavit, where we talk about review
16 of work-order status and report results. This is
17 part of the process that we build.

18 The next one, the third one, is
19 DTE-Covad-8, in which you asked for documentation.
20 I see a summary sheet behind it, their
21 documentation, that says "ILEC-caused highlighted in
22 yellow." I don't know which ones were highlighted
23 in yellow because of my machine, so I would
24 certainly need additional detail.

Page 4326

1 But to just look, that they're saying
2 that 60 percent were ILECs-caused of the
3 cancellations, I'm at a loss to figure out, when I
4 look at the list, how we can be blamed because a
5 loop is too long, and I can't even add up to get up
6 to the 60 percent unless I put in no ILEC
7 facilities, and even then I don't come up to what
8 they're claiming our problem is. So even with the
9 data on this piece of paper it doesn't match what
10 they say on this piece of paper.

11 Again, the no-facility issues have to be
12 recognized. This is technology that is looking for
13 utilizing the frequencies on old copper cable, and
14 we may or may not have those facilities out there.

15 That's the only ones I was able to peel
16 back. I would need certainly more information on 8
17 to go further. No. 3 is just such a
18 mischaracterization.

19 I didn't get to the others. Most of the
20 others were, they said special studies were
21 required. They made claims without substantiation.

22 MR. ROWE: Ms. Abesamis?

23 WITNESS ABESAMIS: I'd like to refer you
24 to the supplemental-measurements affidavit of August

Page 4327

1 4th. It's Page 10, Paragraph 22. In this paragraph
2 we stated that we conducted a special study that
3 measured the requested due date to the confirmed due
4 date that Verizon provides to the CLECs for the
5 month of June. I noted in the supplemental
6 affidavit at that paragraph that the complex orders
7 were excluded, and we didn't have an opportunity to
8 review the details of complex orders for six of the
9 CLECs, because the process of the simple matching of
10 requested due date to our confirmed due date is more
11 involved with complex orders.

12 Since our August 4th filing Ms. Canny
13 and myself have had an opportunity to examine over
14 3,000 local-service requests for complex orders.
15 Specifically I mean two-wire digital and two-wire
16 xDSL orders. At the first review the initial match
17 of requested dates to the confirmed dates was 71
18 percent. We said we needed to look further at this
19 process. As we reviewed it, it was noted that an
20 additional 7 percent of the orders that we initially
21 sorted as not matching were in fact provided -- the
22 confirmed due date that was provided was in
23 accordance to our carrier-to-carrier guidelines, the
24 orders had been received after 3:00 p.m., or an

Page 4328

1 additional 14 percent of the orders, almost 500 of
2 them that we scored initially as a mismatch, were in
3 fact confirmed with the carrier-to-carrier guideline
4 rules and business rules of the standard interval.

5 It left a very small portion, about 9
6 percent of the orders, that we needed to investigate
7 further. In that we found that 95 percent of those
8 orders were in fact given the correct interval based
9 upon the fact that manual loop qualification was
10 necessary on those orders. It's about 217 of those.

11 So just to note, virtually all the 3,000
12 orders that we reviewed for the complex -- or all
13 the requests, I'm sorry, that we reviewed for
14 complex orders were in fact given the due date that
15 was either requested or the due date that is
16 designated in the carrier-to-carrier guidelines.

17 MS. CARPINO: Thank you.

18 MR. ROWE: That's all we have.

19 MS. CARPINO: Ms. Reed, do you have any
20 questions?

21 MS. REED: Yes, I do. This is for the
22 Verizon panel.

23 CROSS-EXAMINATION

24 BY MS. REED:

Page 4329

1 Q. I'm concerned about the DSL-OSS line-sharing
2 systems that Verizon is, as I understand, under a
3 commitment to deploy in Pennsylvania starting March
4 1st, 2001. My question is this for the panel -- and
5 perhaps specifically to Mr. White: Has Verizon
6 created any plans to mechanize the DSL line-sharing
7 OSS's in any region besides Pennsylvania as of March
8 1st, 2001?

9 A. [WHITE] This is a subject of the
10 arbitration proceeding that we were having. But the
11 software --

12 Let me first say that we're up and ready
13 to do line-sharing now. I want to make that
14 absolutely clear. We have the OSS's to take the
15 orders from the CLECs. The only discussion here is
16 that there's a Telcordia software package that
17 impacts 11 of our systems in the company, where a
18 code is being written and we're going to be updating
19 those systems that will help our back-end work. It
20 will help the flow-through for Bell Atlantic. As
21 far as the CLECs are concerned, this is transparent
22 to them.

23 We have established when we will get the
24 code from Telcordia, and that is February 15th, and

Page 4331

1 Pennsylvania Public Utility Commission currently has
2 before it a recommended decision by the Pennsylvania
3 administrative law judge to have these line-sharing
4 OSS's in place by March 1st. We have many regions,
5 many states in the Verizon footprint, that want
6 these. What I'm trying to find out is if there's a
7 plan in place today as to the rollout. That's what
8 I'm trying to find out.

9 A. [WHITE] The schedule of which state goes in
10 which order has not been established, except for the
11 order from the PUC in Pennsylvania. So Verizon has
12 not put them in sequence.

13 But I'd still have to come back: It is
14 not impacting the ability to order line-sharing.
15 That can be done today. It is being done today.

16 Q. But it does impact, does it not, whether
17 those orders are processed manually or in a
18 mechanized fashion. Am I correct on that?

19 A. [WHITE] Not to the CLEC. The CLEC gets
20 mechanized. So the CLECs have a mechanized
21 interface and they will utilize the mechanized
22 interface. There are additional steps that we have
23 to do internally because we don't have all of the
24 code built to take all these fields and the flow-

Page 4330

1 we will need to roll out area by area and make sure
2 that -- we can't do all areas simultaneously. But
3 the CLECs and Bell Atlantic will work together to
4 prioritize where to do which area. But we have
5 every intention of doing it in an expeditious
6 fashion. I would not want to put -- I don't know if
7 we had established a date. I'd have to go back in
8 the records. But we did discuss in the other
9 hearing about the interval, of which date would be
10 done first.

11 MS. CARPINO: Ms. Reed, as you know,
12 since you did participate in the Phase III hearings,
13 that these were issues that we discussed during that
14 hearing.

15 MS. REED: Yes. I have a problem,
16 though, because those issues are still outstanding
17 and they relate directly to what's happening here.
18 As you know, we have filed our brief in the 98-57
19 line-sharing tariff today. The initial briefs are
20 actually due tomorrow. This is one of the areas
21 that we have addressed in our brief, is the time
22 frame.

23 Now, the time frame that I believe we're
24 talking about is a one-month rollout, and the

Page 4332

1 through built. But that's all internal to Bell
2 Atlantic, and it hasn't hurt our ability to be able
3 to do it volumewise or anything like that. We can
4 handle line-sharing today.

5 Q. Thank you, Mr. White.

6 MS. REED: We have a number of issues
7 that we have addressed in the DSL tariff case, DTE
8 98-57, Phase III, that in our opinion should be
9 included in the record in this docket as well. So
10 I'm going to ask the Department if they would
11 consider allowing us to file our initial brief in
12 this docket, 99-271.

13 MS. CARPINO: I don't think that's
14 necessary, and it was an issue that was raised by
15 another participant in this proceeding. I spoke
16 with an individual down at the Federal
17 Communications Commission, and they didn't recognize
18 that as being any hindrance to a participant to
19 raise an issue, that the physical copy of which is
20 not in our 271 docket. So it's from our perspective
21 not an issue. It's not necessary for you to do
22 that.

23 MS. REED: I appreciate that. How will
24 the FCC understand the concerns unless it's in the

Page 4333

1 record?

2 MS. CARPINO: Any party that files a
3 statement with the FCC can attach whatever document
4 they would like to.

5 MS. REED: I see. So that's where this
6 information should go, in the FCC filing, not in
7 this proceeding. Thank you.

8 Nothing else further.

9 MS. CARPINO: Ms. Scardino?

10 MS. SCARDINO: I have a few questions
11 relating to DSL, but I wanted to follow up on one of
12 Ms. Reed's questions.

13 CROSS-EXAMINATION

14 BY MS. SCARDINO:

15 Q. Mr. White, you testified that the lack of an
16 automated OSS for line-sharing, Bell Atlantic
17 systems, has no impact on the CLECs' ordering line-
18 sharing; is that correct?

19 A. [WHITE] That's correct.

20 Q. Does it impact the interval that Bell
21 Atlantic offers the CLECs for line-sharing?

22 A. [WHITE] We've had discussions about trying
23 to reduce that interval, and that is --

24 Q. But does it impact the interval?

Page 4334

1 A. [WHITE] If the interval was reduced,
2 compressed to a very short interval, it would not be
3 possible without it. So it could impact if we tried
4 to shorten the interval.

5 Q. I'd like to ask a few questions on the
6 supplemental checklist affidavit dated August 4th;
7 specifically, a statement that's referenced in
8 Paragraph 99 at the bottom, where Verizon states
9 that the claims by CLECs of nondiscriminatory access
10 to DSL services are specifically undermined by C2C
11 results for two-wire xDSL services. It's Paragraph
12 99 on my Page 46.

13 A. [WHITE] Yes, I'm on that page.

14 Q. Is that a correct statement there, that the
15 claims raised by CLECs of nondiscriminatory access
16 to DSL services are undermined by the carrier-to-
17 carrier results for DSL services?

18 A. [WHITE] That's an accurate statement.

19 Q. Let's turn, then, to the data, carrier-to-
20 carrier data, which this statement I believe is
21 referring to for the two-wire DSL services. Ms.
22 Abesamis, some of these questions may relate to the
23 metrics themselves, which I know you have expertise
24 in.

Page 4335

1 If we turn to the June data --

2 MR. ROWE: Ms. Scardino, just so we're
3 clear: You're in Exhibit G 1 to the OSS
4 supplemental affidavit?

5 MS. SCARDINO: Yes. It's the actual
6 carrier-to-carrier metrics for --

7 MR. ROWE: We need a page reference.
8 though.

9 MS. SCARDINO: G 1, June data, Page 10
10 of 14.

11 Q. I'd like to focus on two metrics. Actually,
12 I'm sorry, it's Exhibit G 2. It's Page 10 of 14.

13 Ms. Abesamis, before we look at the
14 data, let's focus on what the Z score means for your
15 data and how you calculate the data. A Z score of
16 negative 2, does that mean -- is that the threshold
17 for Bell Atlantic not being in parity?

18 A. [ABESAMIS] I don't know if I'm the best
19 person to answer that question, because the Z score
20 relates to the performance-assurance plan
21 calculations. I wouldn't say that it's just a
22 negative 2 actually shows that the statistical
23 validation is out of parity at that point, but I
24 don't know anything further about....

Page 4336

1 Q. Let's turn, then, to Exhibit H of your
2 affidavit that you sponsored. Exhibit H, marked
3 Abesamis/Canny Exhibit H. Specifically, we could
4 look at any page at the bottom of that. It says
5 "parity/standard not met, minus 2." Is that
6 correct?

7 A. [ABESAMIS] Yes.

8 Q. And that's part of your affidavit; correct?

9 A. [ABESAMIS] Correct.

10 Q. So a negative-2 score means for purposes of
11 your performance-assurance plan and for purposes of
12 the metrics, not parity or out of parity; correct?

13 A. [ABESAMIS] Correct.

14 Q. Would a negative-3 score also be out of
15 parity?

16 A. [ABESAMIS] Once we reach a negative-2
17 score, we don't score it any further.

18 Q. So anything, then, above a negative 2 would
19 mean --

20 A. [ABESAMIS] Be out of parity.

21 Q. And so negative 3, negative 4, negative 5.

22 A. [ABESAMIS] Right.

23 CHAIRMAN CONNELLY: I didn't understand
24 your question, when you said "And so negative 3,

Page 4337

1 negative 4, negative 5." You didn't finish the
2 thought.

3 Q. The negative-2 score, again, as we
4 established, is the baseline for establishing out of
5 parity. My question is: Would a negative 3 or a
6 negative 4, negative 5, going down, that would also
7 mean out of parity; correct?

8 A. [ABESAMIS] If we calculated it that way,
9 yes.

10 Q. Let's turn, then, to the June data, again on
11 Page 10 of 14; specifically, metric PR 5-01, which
12 is percent missed appointments facilities. Looking
13 at your carrier-to-carrier metrics, that is the
14 percent of orders completed after the committed due
15 date due to lack of Bell Atlantic facilities; is
16 that correct?

17 A. [ABESAMIS] Yes.

18 Q. And Ms. Abesamis, can you read me what that
19 Z score is for the June performance, again, in the
20 far-right column?

21 A. [ABESAMIS] It's a negative 43.32.

22 Q. And that would mean that you're out of
23 parity; is that correct?

24 A. [ABESAMIS] Correct.

Page 4338

1 Q. Let's, then, look at PR 6, which is
2 installation quality, and specifically the metric PR
3 6-01, percent installation troubles reported within
4 30 days, which would you agree is the metric that
5 measures the percent of troubles report within 30
6 days of installation? Is that correct?

7 A. [ABESAMIS] Correct.

8 Q. PR 6-01 again, on the June date, Page 10 of
9 14, can you read me the Z score in that far column,
10 what that says?

11 A. [ABESAMIS] Negative 8.92.

12 Q. Would you agree that's out of parity as
13 well?

14 A. [ABESAMIS] As measured against -- Let me
15 just clarify: as measured against the Bell
16 Atlantic, or now Verizon, retail.

17 A. [WHITE] Which is not a comparable statistic
18 to measure --

19 Q. I realize what your testimony says. I'm
20 asking, does the data show that it's out of parity,
21 and I believe the answer is yes.

22 A. [ABESAMIS] As it is measured today, yes.

23 Q. Now let's turn to the May data, same
24 metrics. That would be on Page 9 of 14 in that same

Page 4339

1 exhibit, G 2.

2 Excuse me; I'm sorry, it's going to Page
3 10 of 14. Again, Ms. Abesamis, let's go back to PR
4 5-01, which is the percent missed appointments due
5 to Bell Atlantic facilities. Can you read me the Z
6 score in that column?

7 A. [ABESAMIS] Negative 26.32.

8 Q. And again, that would be out of parity;
9 correct?

10 A. [ABESAMIS] As measured against this
11 standard, yes.

12 Q. Let's then go down to PR 6-01 again, percent
13 installation troubles reported within 30 days. What
14 is the Z score there?

15 A. [ABESAMIS] Negative 8.33.

16 Q. Again, out of parity?

17 A. [ABESAMIS] Yes.

18 CHAIRMAN CONNELLY: Excuse me. You're
19 just asking the witness to confirm data point after
20 data point, which is something that's already on
21 paper before us. Are you going somewhere with this?

22 MS. SCARDINO: Yes. I believe I'm
23 establishing that the statement in Paragraph 99 of
24 the measurements affidavit, where Bell Atlantic

Page 4340

1 states that their carrier-to-carrier results
2 specifically undermine CLECs' claims that they're
3 receiving nondiscriminatory access to DSL
4 services --

5 CHAIRMAN CONNELLY: Isn't that something
6 you can deal with on final argument, rather than
7 step us through page after page?

8 MS. SCARDINO: I can be brief. I just
9 have one further question about maintenance and
10 repair.

11 CHAIRMAN CONNELLY: Go ahead with it,
12 then.

13 Q. That was for provisioning of DSL services.

14 Let's turn to maintenance and repair, which is on
15 Paragraph 150, again, of the measurements affidavit.

16 A. [ABESAMIS] Of the measurements affidavit?

17 Q. Excuse me, of the checklist affidavit.

18 MR. ROWE: Paragraph 150?

19 MS. SCARDINO: Yes.

20 Q. In that paragraph there's a statement that
21 says, "Moreover, the data shows that the incidence
22 of repair for UNE loops is comparable to that of
23 retail services."

24 A. [THOMAS MAGUIRE] Yes.

Page 4341

1 Q. Does that statement means it's in parity
2 with retail services?
3 A. [THOMAS MAGUIRE] It means it's comparable.
4 Q. The performance is comparable; correct?
5 A. [THOMAS MAGUIRE] The incidence of repair,
6 yes.
7 Q. If we could just look -- and I will just
8 highlight the June data. If we go to, again,
9 Exhibit G 2, maintenance and repair. If we look at
10 MR 2, network trouble-report rate, which is the --
11 A. [THOMAS MAGUIRE] MR 2-02.
12 Q. Which measures the amount of troubles
13 reported in a given month. Is that a fair
14 characterization of what it is?
15 A. [THOMAS MAGUIRE] Yes.
16 Q. Again, on the June data, MR 2-02, network
17 trouble-report rate for loop, under two-wire DSL
18 services on Page 11 of 14: Ms. Abesamis, could you
19 read what the Z score is in that far column there,
20 under MR 2-02?
21 A. [ABESAMIS] Negative 7.54.
22 Q. Two-wire xDSL services, maintenance for
23 June, MR 2-02?
24 A. [ABESAMIS] I'm sorry. Negative 13.99.

Page 4342

1 Q. One final question relating to the line-
2 sharing metrics referred to in your affidavit, Ms.
3 Abesamis. Paragraph 27 of the measurements
4 affidavit -- again, the supplemental affidavits that
5 were filed on August 4th.
6 A. [ABESAMIS] I'm there.
7 Q. In that paragraph you discuss the status of
8 the line-sharing metrics that are under discussion
9 in the carrier-to-carrier proceeding in New York; is
10 that correct?
11 A. [ABESAMIS] Yes.
12 Q. What is the status of those measurements?
13 A. [ABESAMIS] The line-sharing measures have
14 reached consensus status in the carrier-to-carrier
15 working group. They're intended to be quoted along,
16 if I'm not mistaken, August 25th to the public
17 service commission in New York for review in their
18 September or October review process and then would
19 be ordered. If so ordered, we would then implement
20 them from a metrics perspective for Massachusetts as
21 well, since the Department has adopted the New York
22 carrier-to-carrier guidelines.
23 Q. And did you agree to those line-sharing
24 metrics in New York in that proceeding?

Page 4343

1 A. [ABESAMIS] Yes, we did.
2 Q. Would you agree to incorporate those same
3 line-sharing metrics that you agreed to in New York
4 into Massachusetts?
5 A. [ABESAMIS] That's the practice anyway, yes.
6 Q. Yes, you will?
7 A. [ABESAMIS] Yes.
8 Q. Is that correct?
9 A. [ABESAMIS] Yes.
10 MS. SCARDINO: Thank you. I have no
11 further questions.
12 MS. CARPINO: Are there any other
13 questions?
14 Ms. Reed?
15 MS. REED: I'm a little troubled by the
16 decision not to incorporate the briefs on DSL into
17 this case because I'm not convinced at this point
18 that the record in this case contains the DSL
19 information that is necessary for the Department --
20 not the FCC, but the Department -- to make its
21 recommendations to the FCC.
22 I would ask that --
23 CHAIRMAN CONNELLY: Why don't you submit
24 us a letter on that this afternoon or tomorrow and

Page 4344

1 we'll take it under advisement.
2 MS. REED: I would appreciate that. I
3 would hope that the Commissioners would reconsider
4 this decision. Thank you.
5 CHAIRMAN CONNELLY: Put that in your
6 letter.
7 MS. SCARDINO: Just to add to that:
8 Rhythms shares the same concern of Ms. Reed, that we
9 would like the record in that proceeding to be
10 incorporated somehow, be it pleadings be filed here
11 or the actual record fully incorporated.
12 MS. CARPINO: Thank you.
13 Mr. Oxman?
14 MR. OXMAN: I want to make sure I'm
15 doing this procedurally properly. I do have a few
16 questions for the panel, and then Covad's witnesses
17 obviously have issues they want to address related
18 to the testimony of the panel. Which part of that
19 would you like me to do now?
20 MS. CARPINO: You may ask your questions
21 now, then go to your experts.
22 MR. OXMAN: Thank you.
23 CROSS-EXAMINATION
24 BY MR. OXMAN:

Page 4345

1 Q. Mr. White, these metrics that Ms. Scardino
2 has been referring to -- and I'll take the June
3 metrics just as an example -- look the same to me as
4 the metrics that you submitted in New York in
5 support of your 271 application. Are these metrics
6 amassed by Verizon pursuant to the same methods used
7 in New York?

8 A. [ABESAMIS] I think I'm a better person to
9 answer that question. I'm Ms. Abesamis. The answer
10 is yes.

11 Q. I do have to ask this next question, Mr.
12 White, though: In the New York proceeding, Mr.
13 White, do you recall a joint meeting held between
14 Verizon, Covad, and the Federal Communications
15 Commission in December of 1999 which was attended by
16 Chairman Kennard and several representatives of the
17 Common Carrier Bureau?

18 A. [WHITE] Yes, I do.

19 Q. This was a debate between Verizon and Covad
20 related to the data submitted by then-Bell Atlantic
21 in support of their New York 271 application. Is
22 that your recollection?

23 A. [WHITE] The data submitted by Bell Atlantic
24 and the data submitted by Covad.

Page 4347

1 Verizon to compile loop data for reporting in these
2 metrics before the Massachusetts Department?

3 A. [WHITE] No.

4 A. [ABESAMIS] I'm sorry.

5 A. [WHITE] No, it is not.

6 Q. Can you tell me the method that Verizon used
7 to compile the number of observations for -- let's
8 takes one particular metric -- the number of
9 observations for PR 2-02, average interval
10 completed, total dispatch?

11 A. [ABESAMIS] I can answer that. The PR 2-02
12 average interval completed, the observations are for
13 the specific month -- and we'll take June -- and
14 they are those orders that are completed, the
15 interval of those orders that are completed -- Let
16 me start over.

17 The observations are based upon orders
18 completed that would include the time delay of any
19 order that was missed due to a Verizon reason.

20 Q. So the number of observations -- let's stay
21 with this metric, PR 2-02; and for purposes of
22 people that want to follow along, this is Exhibit
23 G-2, Page 10 of 14, the same exhibit that Ms.
24 Scardino was using.

Page 4346

1 Q. Right. The purpose of the debate, am I
2 correct in saying, was to attempt to reconcile a
3 vast difference between the loop data submitted by
4 Covad and the loop data submitted by Bell Atlantic?
5 Is that an accurate assessment of the purpose of
6 that debate?

7 A. [WHITE] I don't know loop data, but it was
8 orders -- it was the PON lists that were being
9 discussed, intervals on your orders.

10 Q. And do you recall that one of the topics
11 discussed was the difference between the number of
12 loops that Covad contended it had ordered in a
13 particular month and the number of loops that Bell
14 Atlantic was reporting that had been ordered in a
15 particular month?

16 A. [WHITE] Yes, I do.

17 Q. Do you recall that in the course of that
18 meeting you stated that Bell Atlantic compiled loop
19 data by examining the number of loops that had been
20 billed to CLECs in a particular month, not the
21 number of loops that had been ordered in a
22 particular month?

23 A. [WHITE] Ms. Canny made that statement, yes.

24 Q. Is that the same method that was used by

Page 4348

1 PR 2-02 reports a number of observations
2 of 1,193 for all CLECs; is that correct?

3 A. [ABESAMIS] Yes.

4 Q. So, to make sure I understand what you're
5 saying, that represents the number of loops that
6 were due in the month of June?

7 A. [ABESAMIS] No, that represents the number
8 of orders that were completed within the month of
9 June that required a dispatch.

10 Q. So you're measuring the number of orders
11 that you actually completed.

12 A. [ABESAMIS] Correct, in that measure, yes.

13 Q. And what is an order that has been
14 completed?

15 A. [ABESAMIS] An order that has been
16 provisioned and also completed and sent to our
17 billing system.

18 Q. So orders that were due but not completed
19 would not be reflected in this total number of
20 observations.

21 A. [ABESAMIS] That's correct.

22 Q. So the 1,193 observations for the month of
23 June is not a reflection of the number of loops that
24 Verizon was supposed to provision on a particular

Page 4349

1 date in June.

2 MR. ROWE: The question is objectionable
3 in the way it's set, but I think we can answer it.

4 MR. OXMAN: I'm sorry. I'll rephrase
5 the question, if you like.

6 CHAIRMAN CONNELLY: He hasn't asked you
7 to. If you can answer it, go ahead.

8 A. [THOMAS MAGUIRE] Typically provisioning
9 measures -- an order is measured or captured for
10 results purposes once it's been completed in our
11 systems. That usually means that the provisioning
12 has taken place, it's completed, turned over to the
13 customer, and that it's passed through the
14 subsequent systems for the billing completion as
15 well.

16 So, for example, there could be orders
17 that are placed in June that are due on the last day
18 of June but don't hit completion until the first day
19 of July. They will be captured for measurement
20 purposes in the month of July. So it's when the
21 order is completed in the systems as opposed to when
22 provisioning work is actually done. It's
23 traditionally been that way for as long as I've been
24 there.

Page 4351

1 metric. Maintenance metrics deal with trouble
2 reports. Provisioning metrics deal with service-
3 order functions or activities. So they're somewhat
4 independent of each other except for the I-codes
5 that we discussed earlier.

6 Q. If a trouble ticket is opened on a loop that
7 Verizon has completed in its records -- in other
8 words, Verizon has turned over the loop to the
9 CLEC -- that trouble ticket does not affect that
10 metric?

11 A. [ABESAMIS] No, there's a separate metric
12 that reports it, and that's the PR 6 metric, which
13 is the installation trouble reports within 30 days
14 of a service or product being provisioned. That's
15 where it would be captured.

16 Q. Could I refer to you Paragraph 144 of the
17 supplemental affidavit.

18 MR. ROWE: The checklist affidavit?

19 MR. OXMAN: Thank you.

20 Q. This is a paragraph purporting to report on
21 a Verizon study of Covad's claims related to trouble
22 tickets. To whom should I address questions? Mr.
23 Maguire, Mr. White. But I address it to the panel.
24 Paragraph 144 reports that 55.6 percent

Page 4350

1 A. [WHITE] But different from last year, in
2 Washington, when it was based on after they'd flowed
3 through all the billing, so there was an additional
4 delay in the process. So we've now based it on
5 activity-based reporting, as opposed to billing-
6 based reporting. It keeps it more current.

7 Q. So, again, to make sure I understand: The
8 completion interval measures the interval for loops
9 that were provisioned during the month of June but
10 excludes loops that were due but not provisioned.

11 A. [ABESAMIS] Yes.

12 A. [WHITE] And it also includes loops that
13 were due in prior months that were provisioned in
14 June that would have been missed in prior months.

15 Q. Another question for the panel related to
16 the provisioning metric. Am I correct in
17 understanding that this metric excludes -- or
18 includes loops that are provisioned and then turned
19 over to the CLEC and then a CLEC opens a trouble
20 ticket on that loop? In other words, if the loop is
21 closed and a CLEC opens a trouble ticket, that loop
22 is still included in the completed metric; is that
23 correct?

24 A. [THOMAS MAGUIRE] In the provisioning

Page 4352

1 of Covad's trouble tickets in this study group were
2 closed as no trouble found; is that correct?

3 A. [THOMAS MAGUIRE] Yes.

4 Q. Is it also correct that the remainder of
5 those trouble tickets, approximately 44 percent,
6 eventually had a trouble found?

7 A. [THOMAS MAGUIRE] Whatever the inverse of 55
8 is; that's correct.

9 Q. So it would be correct to say that 44
10 percent of the trouble tickets submitted by Covad to
11 Verizon during this time period resulted in a
12 trouble found on a loop.

13 A. [THOMAS MAGUIRE] Yes.

14 Q. Is it Verizon's contention that those 44
15 percent of the loops subject to those trouble
16 tickets where trouble was found were provisioned and
17 completed to Covad on the date that Verizon reported
18 in its metrics?

19 A. [WHITE] Starting with the provisioning
20 question, going into a maintenance question: On the
21 provisioning, we established the procedure to call
22 Covad and jointly test with them, and Covad accepts
23 the circuit and gives us a serial number that they
24 have a good test. We're seeing some issues, that

Page 4353

1 those acceptances, where we're making sure there's
2 continuity, it certainly appears that they're coming
3 back as a retest and they don't like the circuit
4 after. So there's some mixture here between
5 installation and repair that we're seeing.

6 Q. All I'm trying to establish is whether for
7 purposes of reporting Verizon's performance to the
8 Commission in this docket, whether a loop that
9 Verizon reports as completed and provisioned to
10 Covad that is subsequently part of this family of 44
11 percent of loops that were subject to trouble
12 tickets and trouble was found, whether those loops
13 are still reported as having been completed.

14 A. [THOMAS MAGUIRE] The answer to the question
15 is yes. But as I mentioned in my earlier
16 presentation, there seems to be a high incidence of
17 I-codes, which is what we discussed earlier with Ms.
18 Scardino, when Ms. Scardino asked Ms. Abesamis to go
19 through the June results related to PR 6-01. There
20 seems to be a recent phenomenon where we turn
21 circuits over to a DLEC, for example, they accept
22 it, and then they turn around and issue a trouble
23 ticket soon thereafter. As a matter of fact,
24 specifically in Covad's last filing, I think they

Page 4355

1 are loops that you tested and you said were
2 complete; then we complete them.

3 Q. Thank you for your affirmative answer, Mr.
4 Maguire.

5 MR. OXMAN: We'd like to address this
6 topic further, by those witnesses for Covad that
7 have an expertise in this area, but I assume you'd
8 like to wait for the Covad panel.

9 MS. CARPINO: Off the record.
10 (Discussion off the record.)

11 MS. CARPINO: Back on the record. We'll
12 have a few more questions and then break for lunch.
13 BY MR. OXMAN:

14 Q. Ms. Abesamis, your DSL loop metrics all
15 exclude what are commonly referred to as facilities
16 issues from reporting; is that correct?

17 A. [ABESAMIS] I don't understand. They
18 exclude?

19 Q. What are commonly referred to as facilities
20 issues. In other words, Verizon attempts to
21 provision a loop and discovers what it categorizes
22 as facilities issues; in other words, facilities are
23 not available to provision the loop.

24 A. [ABESAMIS] We don't exclude those.

Page 4354

1 mentioned that they were doing that.

2 Now, it seems to me that what some of
3 the companies appear to be doing is, rather than run
4 the risk of having a provisioning order be denied
5 due to the unavailability of facilities, they're
6 locking in a loop and then they're asking us to go
7 out and fix it on a maintenance basis. We've run
8 into instances -- when I'm referencing the 15
9 percent of the I-codes, or 15 percent of the
10 troubles that had a duration of 72 hours or greater,
11 many of those were referred to engineering and
12 essentially they had to be reprovisioned.

13 So you're right on the money. But it
14 seems to me -- that's what I mentioned earlier, that
15 we seem to be polluting some of the maintenance
16 numbers by having provisioned loops that were
17 accepted by the DLECs that -- just based on
18 continuity, as opposed to some of the other
19 characteristics that are required.

20 Now, again, as I mentioned, we're kind
21 of blind to that stuff, hence the cooperative
22 testing process.

23 A. [WHITE] But the bottom line is, it's not
24 completed until you say it's completed. So these

Page 4356

1 Q. You don't.

2 A. [WHITE] On the installation, they are not
3 included.

4 Q. I'm getting two answers from two different
5 witnesses.

6 A. [THOMAS MAGUIRE] I'm in the middle, so why
7 don't I take a shot. I'm going to paraphrase your
8 question, which my lawyers will kill me for doing,
9 but I'll do it anyway. You're asking whether or not
10 we go out on a service order and discover there are
11 no facilities. That order subsequently gets
12 canceled due to no facilities. You're asking
13 whether or not that's captured in the provisioning
14 metrics?

15 Q. Correct.

16 A. [THOMAS MAGUIRE] And the answer is no.

17 A. [ABESAMIS] No, it's not. I thought that
18 you said scored.

19 Q. That's okay. Prior to Verizon dispatching
20 on a loop provisioning for Covad, is it correct to
21 say that Verizon assigns a facility to Covad?

22 A. [WHITE] Yes, prior to dispatching.

23 Q. Can you explain to me how, having assigned
24 that facility to Covad, a loop order would

Page 4357

1 subsequently be classified as a no-facilities?
2 A. [WHITE] First of all, you need a spare
3 copper loop in order to do an assignment. When we
4 began the process, we made sure that it was a spare
5 and we would assign to it. There were so many areas
6 where we don't have any spare facilities at all, we
7 agreed to do transfers to look to try to find
8 another pair and move another customer to, let's say
9 DLC, to free up a copper pair or to move a line from
10 one terminal to another to free up a copper pair.
11 So that we undertake -- so all orders may have an
12 assignment, but that assignment may not be a spare
13 copper pair to start with; it may need to be created
14 through a line-and-station transfer.
15 When you go out to the field and you're
16 on cable plant that is at least ten years old, it
17 could be 60 years old, it had less than a 2 percent
18 defect rate when it was installed 30 years ago, it
19 is more than that today. These loops don't always
20 successfully work. We attempt to make the transfer.
21 We attempt to clear the pair. But the fact of the
22 matter is, because it says it's spare or because we
23 think we can work up a way to find a spare or create
24 a spare out there, they aren't always successful.

Page 4358

1 The more that we do this, the more that we continue
2 to use up whatever spare copper pairs that are out
3 there. It is a difficult process, and the last pair
4 is always the hardest to get turned up.
5 Q. So the process of assigning a facility in
6 the course of provisioning a loop doesn't
7 necessarily mean that a facility is available.
8 A. [THOMAS MAGUIRE] Could you say that again,
9 please?
10 A. [WHITE] There's an assignment process that
11 will create a facility. There may be a facility;
12 there may be a facility that we can test and we get
13 out there and find out it doesn't work to that
14 location, it's open to that pole; or it may not get
15 a direct assignment, it may get an indirect
16 assignment: "Use this pair once you move the
17 customer off this line to another line," and we find
18 the other line isn't available, so then we can't do
19 the transfer.
20 Q. I have a question for you about your
21 statement in response to a question earlier this
22 morning about line-sharing readiness in
23 Massachusetts. You stated that Verizon is prepared
24 and ready to offer line-sharing to competitive LECs

Page 4359

1 in Massachusetts; is that correct?
2 A. [WHITE] That's correct.
3 Q. Are you familiar with the line-sharing
4 status update that is provided to CLECs on a regular
5 basis by Verizon?
6 A. [WHITE] Yes, I am.
7 Q. Specifically, are you familiar with the
8 report provided by Verizon to Covad on the 10th of
9 this month?
10 A. [WHITE] Yes, I am.
11 MS. CARPINO: Is this status report
12 regionwide or Massachusetts-specific?
13 MR. OXMAN: It is both regionwide and
14 Massachusetts-specific. It reports on state by
15 state.
16 MR. ROWE: Do you have a copy of that
17 document that the witness could look at?
18 MR. OXMAN: I do.
19 MR. ROWE: It may be you're not going to
20 ask questions specific about the document, and it
21 may be okay.
22 MR. OXMAN: I was going to ask a
23 question about the number of central offices that
24 Verizon reported to Covad is ready for line-sharing.

Page 4360

1 MS. CARPINO: In Massachusetts?
2 MR. OXMAN: In Massachusetts
3 specifically. I don't think that requires a
4 document. It's a number.
5 Q. If I told you that Verizon had reported to
6 Covad on the 10th of this month that of the 65
7 central offices in Massachusetts that Covad had
8 requested line-sharing capability that Bell Atlantic
9 had provisioned through the CFA process only 13 of
10 those, would you say that was correct?
11 A. [WHITE] No.
12 Q. Why?
13 A. [WHITE] Why?
14 Q. Why is that not correct, given that I'm
15 reading this off of a piece of paper that Verizon
16 provided to us?
17 MS. CARPINO: That is dated?
18 MR. OXMAN: The e-mail was sent on the
19 10th of this month, of August, and the report is
20 dated the 1st of August.
21 A. [WHITE] Let me tell you the status of
22 line-sharing in Massachusetts. Two major companies
23 are doing line-sharing -- actually, three. But
24 Rhythms applied for 78 collocations under

Page 4361

1 Arrangement A, where they provide the splitter, and
2 we said to the CLECs that Bell Atlantic would be
3 ready to service anyone that does Arrangement A as
4 soon as they wanted to submit orders, and we will
5 take orders and complete orders for any of those 78
6 locations for Rhythms. The work is in progress, but
7 we know that since a substantial amount of that work
8 is done by the CLEC and less work by us, that within
9 the six-day window we will have complete any Rhythms
10 orders.

11 We offered a second option for
12 collocation, and that was called Option C. That was
13 only offered under the condition that the CLEC
14 understood that we could not guarantee that it would
15 make the June 7th interval, that we would make a
16 best effort to get all this line-sharing in place,
17 that the applications that came in on March 15th
18 would be completed, the first 25 of them would be
19 completed by June 7th and we would continue to work
20 to complete 25 a month, on the assumption that we
21 had splitters and material about three weeks before
22 the completion dates.

23 In Massachusetts applications were
24 submitted on April 15th, not March 15th, a month

Page 4363

1 August.

2 A. [WHITE] No, I think I said that all the
3 Rhythms orders --

4 Q. No, Covad.

5 A. [WHITE] If I'm going Covad-specific, yes,
6 60 percent, working with the arrangements of the
7 delivery of the splitters that came in in July. And
8 we're not going to do all 55 simultaneously, and we
9 certainly can't do 66 if we don't have a full
10 application.

11 MR. OXMAN: Thank you. I have no
12 further questions.

13 MS. CARPINO: Mr. Clancy, do you have a
14 followup to that?

15 MR. CLANCY: Here's the question:
16 Should we tackle the issue now and just deal with
17 it, or after lunch as part of my statement? I'll
18 just make it part of my statement.

19 MR. ROWE: If it's not questions, why
20 don't we make it part of the questions.

21 MR. CLANCY: There's some clarifying
22 statements I'll make.

23 MS. CARPINO: We'll take an hour-and-
24 15-minute break.

Page 4362

1 after New York. Splitters were ordered in May,
2 according to your interrogatory from your other
3 case, that were delivered in June, which came to us
4 in July. You submitted 66 applications, 11 of which
5 have not been followed up and were never completed
6 in application, so we have 55 live applications. As
7 of this morning I show 29 of those applications
8 complete and three that actually can be assigned on;
9 we just have some additional work.

10 So over 60 percent of your work is done
11 and the work is still in progress, and that work
12 is -- the issues that we mentioned in the project
13 management were a function of contracting, it was a
14 function of material availability, and that we
15 continue to do the work for Covad and continue to be
16 on schedule for Covad as promised.

17 Q. So the 29 that are complete in
18 Massachusetts, that includes the providing of CFA to
19 Covad?

20 A. [WHITE] Yes, it does.

21 Q. So your statement, then, just to summarize,
22 and then we'll all go to lunch, is that 60 percent
23 of the central offices that we've ordered in
24 Massachusetts are complete as of today, the 17th of

Page 4364

1 (Recess for lunch.)

2 MS. CARPINO: Back on the record. Mr.
3 Rowe has some updated information on that request by
4 Ms. Reed.

5 MR. ROWE: In this morning's session Ms.
6 Reed asked Ms. Maguire whether the four offices that
7 were referred to as space-exhausted offices in
8 Verizon's earlier presentation continued to be the
9 only offices which were in a space-exhaust
10 condition, and the answer to that question is,
11 Barnstable central office is also in the space-
12 exhaust condition, as of the 12th of June of this
13 year.

14 MS. REED: Thank you, Mr. Rowe. Does
15 that mean that there are only five central offices,
16 then, in Massachusetts that have exhausted space?

17 MR. ROWE: Yes.

18 MS. REED: Nothing else, Ms. Hearing
19 Officer.

20 MS. CARPINO: There's one other
21 housekeeping matter. Before the break Alan
22 indicated that an electronic attachment of the
23 handout that Mr. Maguire passed out earlier today
24 would not be possible. Is that correct?

Page 4365

1 THE REPORTER: Yes.
2 MINDA J. CUTCHER, JOHN BERARD, MICHAEL
3 CLANCY, SHERRY LICHTENBERG, and
4 ROBERT G. WILLIAMS, Witnesses
5 MS. CARPINO: Mr. Clancy, do you have a
6 statement?
7 WITNESS CLANCY: Yes, I do, Your Honor.
8 First off, I'd like to address Mr. White's
9 characterization of Covad's testimony as being
10 inaccurate and misleading earlier -- to state my
11 perspective of his testimony on line-sharing, which
12 was both inaccurate and misleading.
13 I'm looking at an e-mail that was sent
14 out by Eleanor Stein, who is the administrative law
15 judge in New York who presides over the DSL
16 collaborative in New York regarding line-sharing and
17 line-sharing implementation in New York. In an
18 agreement that was reached on March 16th regarding
19 how Scenario C and Scenario A would be administered
20 in New York, Mr. White testified that we had to have
21 the applications in on March 15th. Since we didn't
22 agree until March 16th on how we would do that, it
23 would have been impossible to have applied by March
24 15th. The agreement was to have the applications in

Page 4366

1 by April 15th, which Covad did. There were some
2 discrepancies on those applications. Those
3 discrepancies were resolved by April 22nd.
4 As far as the implementation schedule
5 which was worked out with Bell Atlantic --
6 MS. CARPINO: Mr. Clancy, was this
7 understanding or agreement applied footprintwide?
8 WITNESS CLANCY: Yes. It was initiated
9 in New York, but it was to apply throughout the
10 footprint, with essentially negotiated due dates for
11 the remainder of the footprint. The negotiation was
12 based upon, as John White said, best efforts of Bell
13 Atlantic and the CLEC community.
14 The agreed-to schedule for Massachusetts
15 was that some offices would complete on June 15th,
16 some offices would complete on June 29th, and some
17 offices would complete on July 6th. I followed up
18 with the project manager, who's a Bell Atlantic
19 employee, earlier this week, and I will verify
20 Mr. White's statement that 60 percent of the 55
21 offices are complete at this time. But I will also
22 point out that we are over a month past July 6th.
23 The splitters were shipped into a warehouse, a
24 staging warehouse, in New Jersey, and they were

Page 4367

1 shipped according to the project-management schedule
2 produced by Bell Atlantic. Bell Atlantic called for
3 the splitter shells to be delivered to New England,
4 and they were shipped on July 3rd to five
5 Massachusetts warehouses and two New Hampshire
6 warehouses. I will note that in New England the
7 vendor is Bell Atlantic. Their equipment-
8 installation force does the installation work, all
9 the installation work.
10 So, interestingly enough, two of those
11 offices that were completed -- there were two
12 offices completed prior to July 6th. In fact, they
13 were completed in June, prior to us shipping any
14 splitters to New England, so I wonder how they were
15 completed. But that's just to clarify the
16 statements on line-sharing. Essentially, we're
17 still working together to get line-sharing up and
18 working in New England, which includes
19 Massachusetts.
20 I'd like to also talk about the
21 supplemental affidavit that Bell Atlantic provided.
22 A lot of it was in response to the testimony of
23 Covad and Rhythms. On Paragraph 103 in that
24 supplemental affidavit --

Page 4368

1 MS. CARPINO: This is from August?
2 WITNESS CLANCY: Yes; Bell Atlantic
3 supplemental checklist affidavit.
4 MS. CARPINO: The paragraph, again?
5 WITNESS CLANCY: The paragraph is 103.
6 Verizon states that for the first three months of
7 the year 2000 they have a completion rate of more
8 than 96 percent when customer and facility reasons
9 are excluded. They are excluding facility reasons;
10 and if you look at Paragraph 96 of the same
11 document, the last sentence in that paragraph, it
12 should be noted that orders are not accepted because
13 of loop-qualification reasons about 15 percent of
14 the time, and orders are canceled for no facilities
15 10 to 12 percent of the time. Mr. White testified
16 based on some other data later on today that it was
17 17 percent of the time in June.
18 Let me note that 15 percent of the time
19 where it fails for loop qualification, one of those
20 reasons would be no facilities. So prior to placing
21 an order we will reject a customer's request based
22 upon the fact that the loop-qualification database
23 that Verizon provides us shows that there are no
24 facilities. So we have a gate in the front end, in

Page 4369

1 the preorder process, that says no facilities.
2 I don't know what 15 percent of the
3 overall volume represents. It's one of the things
4 I've pleaded with my own company to start to
5 measure, because we get a sense of the real impact
6 of no facilities. Because no facilities after the
7 fact means that it's gone through the whole
8 provisioning process within Verizon, where they
9 found a pair, as Mr. White testified earlier, or
10 they did a line-station transfer to create a pair,
11 and then could not provide the service over that
12 pair because there was a defect on the pair or
13 something that Verizon doesn't intend to clear.

14 So the overall impact of no facilities
15 is greater than the 12 percent. How great is really
16 unknown. But when you look at a 96 percent
17 completion rate, you're taking that 15 percent you
18 have to initial, so that doesn't even show up in
19 that universe, and then measuring a completion rate
20 less no facilities. So it is somewhat inaccurate to
21 portray -- although that's the way the metric is
22 developed, it's somewhat inaccurate to portray that
23 as the reality, because it's not.

24 In Paragraph 107 on the same document --

Page 4370

1 actually, I'm going to talk about Paragraph 106 and
2 107. In Paragraph 106, "WorldCom fails to
3 acknowledge that Verizon - Mass. has continually
4 upgraded and enhanced its loop qualification
5 database in response to CLEC requests for
6 information. Additional information now available
7 in the loop qualification database includes data on
8 why a loop does not qualify -- for example, presence
9 of digital-loop carrier, T1 in the binder group
10 below coils." And the others would be no facilities
11 and one other category.

12 That statement makes it appear that all
13 offices in the loop qual database have this
14 capability. I've been told by Verizon that any
15 office put in the loop qual database prior to March
16 18th of this year would not have those additional
17 comments in the database. So it's not the entire
18 universe of Massachusetts offices that have this
19 capability. It's something less than the total. So
20 my question there would be what offices are
21 included, what percentage, and so on.

22 MR. OXMAN: Should we make that a
23 proposed record request?

24 MS. CARPINO: The witnesses probably

Page 4371

1 could answer it right now, without making a record
2 request, I would imagine.

3 MR. OXMAN: Okay, when he's finished.
4 Thank you.

5 WITNESS CLANCY: Paragraph 108 talks
6 about cooperative testing or joint acceptance
7 testing. Basically, it says that the WorldCom/
8 Rhythms/Covad claims that the reason loop acceptance
9 testing, also known as cooperative testing, is being
10 done by Verizon - Mass. is because of Verizon's poor
11 loop performance, and the paragraph goes on to
12 describe that that's not why, it's just the test
13 continuity.

14 Joint acceptance testing was one of the
15 first things developed in the collaborative in New
16 York, which began on September 15th in 1999, based
17 on poor provisioning performance of the then-Bell
18 Atlantic. One of the things that was discovered on
19 joint acceptance testing is that often the cross-
20 wiring wasn't complete in the central office, so the
21 whole FOC minus 2 and sharing-of-information process
22 started. And indeed, Bell Atlantic's performance in
23 terms of finishing new cross-wiring in the central
24 office has improved. But to say that it wasn't

Page 4372

1 based upon poor provisioning performance is a
2 fallacy.

3 I'll point to the record of November
4 18th, 1999, here at the DTE, and to the testimony of
5 Mr. White and Mr. Maguire in re: dialogue with me
6 about why loop acceptance testing exists. It's
7 detailed in there why it exists. It is to
8 essentially mimic a process that exists in the
9 retail provisioning of dial-tone loops called
10 dial-tone leaving. It's a way to assure that the
11 central office is wired prior to Bell Atlantic
12 dispatching to the field. In fact, we provide a
13 report, a FOC-minus-1 report, on what tests good and
14 what tests not so good. So that helps them improve
15 their central-office wiring performance.

16 That's the way the process was designed.
17 The reason for the process design is not only to
18 assure continuity, but to assure that we have
19 service leaving the central office. Mr. White likes
20 to refer to these as dangling data links. You look
21 in testimony, and he will describe what that is.

22 Paragraph 111: "Similarly, Covad's
23 statement that Verizon - MA's provisioning is so
24 fraught with 'delay and frustration' that Covad must

Page 4373

1 add extra days to the customer's service interval."
2 and it references my testimony, "ignores the fact
3 that Verizon - MA has an excellent provisioning
4 record." Again, I'll point to what 96 percent
5 really means, as I stated earlier, and I'll also
6 point to Bell Atlantic's testimony that is in
7 Paragraph 144 of this document. This exhibit that
8 was provided by Mr. Maguire today, entitled The Race
9 to Resolution -- it's Page 3 of the document that
10 Mr. Maguire provided.

11 This is an analysis of xDSL troubles
12 reported by Covad between April 15th and June 15th.
13 2000. My colleague, Mr. Berard, can discuss in more
14 detail a study he did, an analysis of FOC-plus-1
15 results, which is the day after the due date, that
16 he did for, I think, the month of June of this year.
17 In that result he found 23 percent of the loops that
18 had been completed by Bell Atlantic and, yes, had
19 been accepted by our joint acceptance practice, or
20 not, depending on whether or not the technician
21 called, or if the technician called and decided to
22 hang up, feeling that they waited too long for
23 someone to pick up, they wouldn't do the test. And
24 based on his analysis of Harris test results, 23

Page 4375

1 repeated report that was closed to a found Verizon -
2 MA problem. That would mean 9.3 percent of the
3 original universe, in addition to the 44-and-change
4 percent, were actually troubles, according to the
5 indications here. But all of this means that the
6 provisioning interval has gotten longer and longer
7 and longer while we try and resolve the trouble with
8 Verizon, and that's reflected in the longer time
9 line on the bottom of here and the statement of
10 long-duration I-codes. So I agree with Bell
11 Atlantic: There is trouble provisioning xDSL loops
12 still, and even with the processes we put in place,
13 and we need to work together to resolve the
14 problems. But the problems are more significant
15 than reflected in Verizon's testimony.

16 In Paragraph 113 and in Paragraph 114,
17 in their comments Rhythms/Covad correctly place a
18 great deal of emphasis on the customer impact of the
19 failure to provision xDSL service. Covad claims
20 that its customers have to stay home more than one
21 time for BA to complete its installation.

22 I will point to Mr. Maguire's document
23 that not only has maintenance issues in it but
24 I-codes, and at five times the regular normal

Page 4374

1 percent of those loops in fact wouldn't work.
2 Either they were open-in or had metallic troubles on
3 them that would not pass data. So those troubles
4 would actually show up in this April and, part of
5 it, June 15th. So part of that 23 percent would
6 show up in this, in this analysis that Bell Atlantic
7 has done -- not all of it, but part of it.

8 56.5 percent of the reports were closed
9 as no trouble found, meaning the reciprocal, as Tom
10 Maguire said before, would be found as real
11 troubles.

12 53.8 of the 55.6 resulted in no further
13 trouble report, according to this document, which
14 would be, I guess, 29.9 percent of the original
15 universe. And then 29 percent of the initial NTF
16 reports, Covad issued repeated trouble reports that
17 never resulted in a found Verizon - MA trouble. The
18 statement does not say that those tickets are closed
19 out. In fact, they could still be pending, looking
20 for the trouble, and we could still be opening up
21 trouble tickets, and they could still be NTF-ing
22 them. And that is my experience in working with
23 Verizon in actually doing this work.

24 Then 16.8 closed to NTF resulted in a

Page 4376

1 no-access rate to indicate the problems that we have
2 when these things don't get provisioned the first
3 time, these DSL loops don't get provisioned the
4 first time.

5 So that is what's being discussed here.
6 As we follow this paragraph down, there's a
7 discussion about a process that we developed for the
8 ILEC technician to call the CLEC when there's a
9 no-access condition, so we can try to proactively
10 create access. I'm not certain that this has been
11 incorporated into the maintenance processes. I know
12 that there are conversations between Jim Katzman of
13 Covad and Mr. Maguire's organization to have that
14 kind of thing, more interaction on the maintenance
15 process, like we have tried to establish on the
16 provisioning process. Without the ability to call
17 an 800 number and intervene, this five-times
18 no-access rate isn't going to go away.

19 Into the lower part of the page that 113
20 appears on, there's a sentence that begins, "In
21 situations." It says, "In situations where a CLEC's
22 customer is home and Verizon - MA encounters a
23 facilities problem, Verizon - MA technicians are
24 required to complete any portion of the job that

Page 4377

1 requires access. The CLEC's customer does not need
2 to be home to provide access to Verizon - MA
3 technicians for the facilities portion of the work."

4 That's not true. My understanding of
5 the process is that when a facility issue is
6 encountered on the original installation, if it
7 can't be cleared that day, in a short period of
8 time, and essentially thrown in the central office
9 and a new facility created, then it goes to cable
10 maintenance as a ticket, for cable maintenance to
11 clear. Now, that would be reflected in Bell
12 Atlantic's results as a miss, or should be.

13 Then, when it comes back into the
14 provisioning center, the RCCC, it actually goes back
15 on the FOC-minus-2 report that is sent out on the
16 CLECs. Everything on that FOC-minus-2 report is
17 getting dispatched. And when this first started to
18 occur, we were given two days' notice, essentially,
19 to contact our customer and try and arrange access.

20 So I believe that even when we make this
21 statement, I don't think the process is so totally
22 developed that this actually happens. What actually
23 happens is a technician is redispached on that
24 loop, and the first thing they look for is access.

Page 4379

1 see a metallic trouble out, we refer it out; if we
2 see a metallic trouble in, we refer it in. So I'd
3 like to see the analysis that supports that Covad is
4 double-troubling Verizon.

5 Paragraph 146: There's a discussion
6 here about a cooperative testing practice that was
7 developed and put in place for the maintenance of
8 complex UNE loops. I believe this issue has been
9 raised at what was called the Bell Atlantic user
10 group meeting, by Covad and other CLECs, and is
11 being discussed by Verizon's RCMC team and their
12 maintenance force, on trying to improve the number
13 of cooperative tests that actually take place. So,
14 yes, the process was written; getting it to work is
15 a different story.

16 I'd like to turn to the document that
17 Mr. White characterized -- or one of the documents
18 that he characterized as inaccurate and misleading;
19 in particular, Covad's response to DTE-Covad No. 8.
20 Mr. White's copy didn't have the yellow. I got a
21 copy from my attorney here, Jason Oxman, which shows
22 what was yellow. So I'd like to share what the
23 results are.

24 Of those canceled, orders canceled,

Page 4378

1 I'll point to Paragraph 114, since
2 Verizon felt it required to discuss this topic, even
3 though these were Verizon - New York orders that
4 were analyzed, where we do have a higher no-access
5 rate. The issue here is that there were 131 orders
6 looked at. My colleague, Mr. Berard, can speak to
7 this in more detail, since he did the actual study.
8 My understanding is that of those 131 orders 70 were
9 previously held for facilities, which is exactly
10 what's being described in Paragraph 113.

11 So if we look at the 53 percent of the
12 131 orders were no-accessed, that includes orders
13 that were previously held for facilities, a large,
14 substantial portion of them, like half of them. So
15 I would say that that's not a process that's been
16 held yet, although it's claimed to be taken care of.

17 In Paragraph 143 of the same document
18 Verizon refers to a phenomenon that they call the
19 double-trouble issue that was discussed earlier and
20 makes an assumption about Covad's frustration, using
21 the term "is most likely related to." I just want
22 to point out that that is a broad assumption on
23 Verizon's part. We have the capability, especially
24 on UNE loops, UNE DSL loops, to test out, and if we

Page 4380

1 where Covad indicated they were ILEC-caused, indeed,
2 6.5 percent of the total that were canceled are
3 canceled because of a duplicate order being issued.
4 It was not correct on Covad's part to characterize
5 that as ILEC-caused, because it's not caused by the
6 ILEC. 32.4 percent were canceled due to no ILEC
7 facilities. I would characterize that as an
8 ILEC-caused.

9 11 percent were canceled because the
10 loop was too long. Given that we rely on the
11 mechanized loop-qual system provided by Verizon in
12 order to process an order, I would say those
13 failures are ILEC-caused because obviously the
14 loop-qual system isn't working 100 percent. So 11
15 percent of the orders were canceled due to long
16 loops, which is an indication that 11 percent of the
17 time that loop-qual tool isn't working right.

18 8 percent of the time trenching was
19 required. Now, trenching is required when a new
20 drop has to be installed where trenching is
21 required, rather than running a drop from a pole. I
22 would say that's ILEC-caused because it would be
23 ameliorated by migrating a second line into the
24 second line available into the home. This was

Page 4381

1 discussed; it was raised by Rhythms in the New York
2 collaborative. Bell Atlantic proposed a resolution
3 to this on April 12th. It's yet to be implemented.

4 And 2 percent of the cancellations were
5 due to digital-loop carrier and 1 percent due to
6 electronics on the line. To say that's ILEC-caused,
7 they're changing their network over to a digital-
8 loop-based network, a fiber-based network. I was
9 very surprised to see that only 2 percent of them
10 were impacted by that, but that's all I see.

11 I think that would correct the record
12 about at least my perspective on the same data.

13 MR. ROWE: Ms. Carpino, we don't have
14 any of that data, and that may be the subject of a
15 further request. We didn't say anything to the
16 extent that Mr. Clancy was referring to our
17 testimony, but to the extent that he returns now and
18 supplements a data request that was late-provided to
19 us anyway, we think that's problematic.

20 WITNESS CLANCY: I'm referring to
21 exactly what John discussed.

22 MR. OXMAN: That's DTE No. 8.

23 MR. ROWE: It's a summary only.

24 WITNESS CLANCY: I'm looking at the same

Page 4383

1 WITNESS CLANCY: Again referring to Mr.
2 Maguire's chart. This would be on maintenance
3 variables, so it would be referencing Page 1 and 2
4 of the chart. Under DSL and digital, it has it
5 looks like CLECs' testing and isolate the trouble is
6 the only variable. The CLEC gets to test the loop
7 and refer a trouble ticket to Verizon. It is then
8 up to Verizon techs to use their own capability,
9 their own technical capability, their own tools and
10 skills to find trouble that's been referred over.

11 So I would say that there should be
12 another box there that includes the joint
13 responsibility that Mr. Maguire referred to when he
14 introduced this document, that there are joint
15 responsibilities.

16 That's the extent of my comments.

17 MR. OXMAN: Covad will endeavor to
18 provide that information to Verizon as soon as
19 possible. I don't know where it's at, but I'll find
20 out as soon as I can. I would note in response to
21 the suggestion that we acted inappropriately in
22 raising it, that Verizon not only raised the issue
23 but characterized our response to the Department's
24 inquiry as inaccurate and misleading. I think it

Page 4382

1 thing you were looking at.

2 MR. ROWE: That's my point.

3 MS. CARPINO: Was there an attachment to
4 that response?

5 MR. OXMAN: With the actual orders? I
6 believe there was.

7 MR. ROWE: Not that we have.

8 MS. CARPINO: Could you provide that to
9 Verizon?

10 MR. ROWE: My point was, Mr. Clancy had
11 time to put in his response. We had very little
12 time to address it. Now he's adding to his response
13 on the record, and I don't think it's appropriate,
14 given the ground rules for this proceeding.

15 MS. CARPINO: We'll give you the
16 opportunity to review the supporting documentation
17 to that response and then to respond further.

18 MR. ROWE: Thank you.

19 MS. CARPINO: Does it make sense for
20 Verizon to address some of Mr. Clancy's --

21 Or we can go to Ms. Cutcher?

22 WITNESS CLANCY: I have one other point
23 I want to make.

24 MS. CARPINO: Okay.

Page 4384

1 was appropriate for us to respond to that.

2 MS. CARPINO: Ms. Cutcher?

3 MS. CUTCHER: I have a relatively brief
4 statement to make on maintenance issues. In January
5 of 1999 I joined Covad, and my position at the time
6 was vice-president of operations for New England,
7 which for all intents and purposes consisted mainly
8 of loop activity in Massachusetts. My technicians
9 were responsible for doing the loop installation and
10 maintenance.

11 Sometime in the spring of 1999 Verizon,
12 then Bell Atlantic, made the decision to move the
13 work responsibility for installation and maintenance
14 of wholesale loops from their POTS technicians, the
15 regular installation and maintenance group, to a
16 special work group called at the time special
17 services. At that point in time I reached out to
18 John Reed, an employee of Verizon, who is the
19 director of special services, to ask for a meeting
20 so that we could sit down and talk about the
21 loop-provisioning and maintenance problems that
22 Covad was having in Massachusetts. John Reed and
23 myself, as well as John's entire second-level
24 manager team, sat down and we from Covad took John

Page 4385

1 and his team through the Covad provisioning process.
2 so he and his team would have a full understanding
3 of how we do what we do. We also shared with him in
4 great detail information, data around loop-
5 provisioning and maintenance results.

6 Going forward from that date, I shared
7 with John Reed, as well as John Griffin, who was the
8 VP of wholesale services, on a weekly basis details
9 of our loop-provisioning and maintenance experience
10 with Bell Atlantic at the time. Specifically,
11 Mr. Reed was given on a weekly basis individual
12 circuit IDs, specific problems with those loops, so
13 he could do troubleshooting with his team, root-
14 cause analysis, find out what went wrong, in hopes
15 of making things better.

16 We also spent a lot of time talking
17 about diagnostic tools, the kinds of tools and
18 equipment that Covad folks have, so when they
19 troubleshoot and install loops that the possibility
20 existed, if Verizon was willing to make the
21 expenditure to purchase such equipment, they would
22 have the same capabilities available to them. We
23 also offered to give to Verizon routers, which sit
24 at the end of the loop, so they could see the same

Page 4387

1 also subsequently developed the ability to send tone
2 on our line, which is another testing tool
3 available. We also have some end users who are very
4 sophisticated, who have the ability to monitor their
5 connection and share with us, and we have in turn
6 shared it with Verizon, specifics around uptime and
7 downtime and specific times and durations.

8 So, you know, again, Covad has
9 proactively added capabilities into their network to
10 help improve the maintenance experience that we've
11 had.

12 MS. CARPINO: Thank you. Off the record
13 for a moment.

14 (Discussion off the record.)

15 MS. CARPINO: Let's go back on the
16 record. We'll continue on with statements by the
17 CLECs. Ms. Lichtenberg, you have a few comments to
18 make?

19 WITNESS LICHTENBERG: I want to speak
20 fairly quickly about the business implications of
21 the technical discussions that we've heard from
22 Covad and others today. As you know, WorldCom is in
23 the business of providing ubiquitous customer
24 residential services. Today we offer voice services

Page 4386

1 kind of loop-characteristic signals that we see on a
2 good loop.

3 So the point I'm trying to make is that
4 we, Covad, have a pattern of proactively going out
5 to share data, specifics, detail with Verizon in the
6 hopes of helping them to improve loop-delivery
7 performance.

8 The next point I'd like to make does go
9 back to Mr. Maguire's chart and the boxes that we
10 referred to. I would like to take exception to the
11 statement --

12 MS. CARPINO: This is the second page?

13 WITNESS CUTCHER: The first page,
14 actually. Mr. Maguire made a statement that
15 inferred that the reason why there was such a
16 difference between wholesale and retail maintenance
17 results had to do with Verizon's lack of tools. So
18 I'm assuming referring to the kinds of boxes that
19 are on the chart. I would suggest, in addition to
20 what Mr. Clancy mentioned, that we have and always
21 have had white noise on our lines, as opposed to
22 dial tone. This is something that specifically the
23 special-services organization is familiar with.
24 It's something they're used to listening for. We

Page 4388

1 in New York, in Texas, and as of last night in
2 Pennsylvania. We are moving towards the ability to
3 offer DSL; and indeed, when I get back to the office
4 tomorrow, we are looking at our business plans.

5 The concerns that we have are the
6 ability to offer this ubiquitously and the tools and
7 the OSS that are available to us as we move forward.
8 Verizon is working towards that now in New York; in
9 Pennsylvania, which has a date for the OSS, as was
10 mentioned earlier; and to some extent in
11 Massachusetts. But we aren't there yet, and we need
12 to keep working toward being there. To date the
13 Verizon affiliate for DSL is not active in
14 Massachusetts, so we have no way of knowing what
15 happened with a company that stands in the same
16 shoes as a CLEC and tries to provision this sort of
17 services, as the FCC has recommended in their other
18 proceedings.

19 There is little experience with DSL,
20 particularly in the line-sharing world. The COs are
21 coming up. They will be there. But we are learning
22 as we go. It's still early. And we heard today
23 that while the OSS is here, there is no flow-through
24 yet, and the kind of production activity has been

Page 4389

1 limited.
2 We want to be in this business, and we
3 want to offer consumers a choice. It's important,
4 though, that we get all of the proceedings here in
5 Massachusetts completed and reviewed and the changes
6 in requirements made before we really know and state
7 that the market is open. And I encourage this
8 Department to continue to think in that direction as
9 we go through these discussions.
10 MS. CARPINO: Thank you.
11 WITNESS LICHTENBERG: You're welcome.
12 MS. CARPINO: Mr. Clancy raised some
13 points in his comments -- raised some questions that
14 were in the form of comments. Would Verizon care to
15 respond to those?
16 MR. ROWE: I don't know whether there
17 are any further questions from the Bench. Then I
18 would like to take a couple of minutes and talk with
19 all of my panelists and return and respond, if we
20 can.
21 MS. CARPINO: Why don't we take five
22 minutes.
23 (Recess taken.)
24 MS. CARPINO: Let's go back on the

Page 4391

1 those 198, 98 percent of the access lines with collo
2 are covered by those 198 wire centers.
3 So the good news is we continue to move
4 forward to populate another 28, and we also add the
5 fields not just in the 28, but in all 198.
6 The second point, I would like to be
7 able to think I could change one of my statements
8 that Mr. Clancy thought was -- from misleading to
9 misunderstanding, because if I didn't say it
10 correctly this morning, let me say it correctly and
11 maybe we can reach agreement on this. What I said
12 is that if applications were submitted in March, we
13 could complete them by the June 6th date. However,
14 we would project-manage anything that came in by
15 April 15th. That I believe is what was agreed upon.
16 And based on the April 15th schedule,
17 which Covad did submit applications for
18 Massachusetts by April 15th, we would have the first
19 group of 25 completed by June 15th, which is the
20 date you said earlier. That time line was based on
21 best efforts, which were your words, based on
22 material availability; and in order to have the
23 first batch completed by June 15th, we needed the
24 splitters three weeks before, in the month of May.

Page 4390

1 record. Mr. Rowe, do your witnesses have any
2 comments.
3 MR. ROWE: Yes, Mr. White would like to
4 respond to two points.
5 AMY STERN, THOMAS MAGUIRE, JOHN WHITE,
6 and BETH ABESAMIS, Witnesses
7 WITNESS WHITE: The first comment I have
8 is just a question that was raised: I think I can
9 answer it. We did earlier this year say that we
10 could add the additional fields in the database to
11 provide whether there was RT information on there.
12 We said that we would do it on a going-forward
13 basis. Since that time we completed 28 additional
14 wire centers.
15 However, back in April we went back into
16 the database and populated all, and actually it's
17 198 wire centers that have that information in
18 there, since April.
19 MR. CLANCY: Massachusetts?
20 WITNESS WHITE: That's just in
21 Massachusetts. That's all I can think about.
22 (Laughter.)
23 WITNESS WHITE: So they are all in there
24 at this point. If I looked at the access lines in

Page 4392

1 In the month of May is when you ordered the
2 splitters, as per your data request that I
3 referenced this morning. You received them in June
4 and shipped them to us in July.
5 So I just want to be sure that we are
6 working best efforts, and we are working together,
7 but I don't want to be categorized as we held that
8 up at all. That's all I have to say.
9 MR. ROWE: That completes our response.
10 MR. OXMAN: I have one followup to that
11 for Mr. White.
12 CROSS-EXAMINATION
13 BY MR. OXMAN:
14 Q. Is the strike at all affecting continued
15 rollout of line sharing in Massachusetts?
16 A. [WHITE] Yes, Karen McGuire is working
17 putting in the relay racks and bays.
18 WITNESS CLANCY: Let her leave now.
19 (Laughter.)
20 A. [WHITE] And I've been assigned on weekends
21 to work on any Covad repair troubles.
22 WITNESS CLANCY: Oh, no.
23 (Laughter.)
24 A. [WHITE] I don't discriminate; I do all the

Page 4393

1 CLECs.

2 Q. You mentioned earlier this morning that in
3 your analysis of our backlog orders that we provided
4 to you that 31 percent of those August orders had
5 not been provisioned because of the strike. Do you
6 know if Verizon's Infospeed retail DSL service is
7 being provisioned in Massachusetts?

8 A. [WHITE] There are no installation orders
9 being provisioned for anyone.

10 Q. So no provisioning of Infospeed retail
11 Verizon service.

12 A. [WHITE] That's correct.

13 Q. Thanks.

14 MINDA J. CUTCHER, JOHN BERARD, MICHAEL
15 CLANCY, ROBERT G. WILLIAMS, Witnesses
16 EXAMINATION

17 BY MS. HONG:

18 Q. I have just one question with respect to
19 maintenance and repair for Ms. Cutcher. Verizon
20 says that when a maintenance and repair appointment
21 falls on Friday, CLEC customers prefer a Monday
22 appointment. Is that true?

23 A. [CUTCHER] I'm not aware of that.

24 Q. Anyone from the CLEC witnesses?

Page 4395

1 WITNESS THOMAS MAGUIRE: That's what our
2 studies show.

3 MS. HONG: So that extends mean time to
4 prepare.

5 WITNESS THOMAS MAGUIRE: So I'm trying
6 to verify whether that's true.

7 A. [CLANCY] I think that would be true for any
8 business customer, because businesses normally
9 aren't open on Saturdays. As our volume increases,
10 the trend of having a predominance of residence
11 rather than business customers, especially with
12 line-sharing, this will have a big impact, because
13 line-sharing is primarily a residential service.

14 What will happen is, if we're given a
15 Saturday appointment, we'd have to contact the end
16 user and make sure they're not going to be at the
17 Cape, something like that. Sorry; down the Cape. I
18 stand corrected.

19 MS. CARPINO: Ms. Reed, did you have any
20 questions for the CLEC witness?

21 MS. REED: Not at this time. Thank you.

22 MS. CARPINO: Mr. Rowe, do you have any
23 questions for the CLEC witness?

24 MR. ROWE: We have no questions for the

Page 4394

1 A. [WILLIAMS] I'm not aware of that. That we
2 want Monday instead of Friday?

3 A. [CUTCHER] We'd take Saturday.

4 A. [WILLIAMS] I thought you said Friday --

5 Q. Let me refer you to Verizon's supplemental
6 checklist affidavit at 138, Paragraph 138.

7 MR. ROWE: Mr. Maguire advises me that
8 you may be confused. It's the Saturday appointment
9 issue, Monday rather than Saturday. People may have
10 misheard and think that that's a Friday appointment.
11 It was really a trouble occurring on Friday being
12 appointed for Saturday.

13 MS. HONG: I'm sorry; would you repeat
14 that?

15 MR. ROWE: The testimony from Mr.
16 Maguire, and you're referring to it, talks about a
17 trouble reported on Friday that could potentially be
18 appointed for Saturday and is instead appointed for
19 Monday. So it's not a Friday appointment issue. If
20 you want to call it a Saturday appointment issue,
21 that's what it would be.

22 MS. HONG: But the CLEC customers prefer
23 a Monday appointment instead of Saturday; right?

24 MR. ROWE: Yes.

Page 4396

1 CLEC witnesses.

2 MS. CARPINO: Off the record for a
3 moment.

4 (Discussion off the record.)

5 CHAIRMAN CONNELLY: Let's go back on the
6 record for a minute. Before we close out, I wanted
7 to just end the week by thanking everyone who has
8 participated here today and throughout this week.
9 We all look forward to your continued participation
10 next week. It's gone very smoothly thanks to the
11 willingness of everyone to heed the ground rules
12 that focus on clearing up factual questions and
13 supplementing things, and not simply going over
14 what's already a matter of record in your recently
15 filed comments. So we thank you all very much for
16 that. Unless there's any further business, why
17 don't we retire, close it out for today and come
18 back on Monday, at which hour?

19 MS. CARPINO: 10:00?

20 CHAIRMAN CONNELLY: 10:00 looks like the
21 hour on Monday. Thank you all very much.

22 (3:08 p.m.)

23

24

Page 4397

CERTIFICATE

I, Alan H. Brock, Registered Professional
Reporter, do hereby certify that the foregoing
transcript is a true and accurate transcription of
my stenographic notes taken on August 17, 2000.

Alan H. Brock, RDR/CRR

INDEX

Checklist Item No. 11, local number
portability, Page 4248
DONALD ALBERT, BETH ABESAMIS, ALICE SHOCKET
4249 by Ms. Reed
4251 by Ms. Parker
4259 by Mr. Munnely
4260 by Mr. Gruber
DAVID KOWOLENKO, Page 4262

Page 4399

Item 4, loops (DSL), Page 4321
AMY STERN, THOMAS MAGUIRE, DONALD ALBERT, JOHN
WHITE, BETH ABESAMIS
4328 by Ms. Reed
4333 by Ms. Scardino
4344 by Mr. Oxman
MINDA J. CUTCHER, JOHN BERARD, MICHAEL CLANCY,
SHERRY LICHTENBERG, ROBERT G. WILLIAMS
4363 Statement by Witness Clancy
4384 Statement by Witness Cutcher
4387 Statement by Witness Lichtenberg
AMY STERN, KAREN MAGUIRE, JOHN WHITE,
BETH ABESAMIS, Page 4390
4392 by Mr. Oxman
MINDA J. CUTCHER, JOHN BERARD, MICHAEL CLANCY,
ROBERT G. WILLIAMS
4393 by Ms. Hong
Exhibit
11 4248

Page 4398

Checklist Item 1, collocation, Page 4263
AMY STERN, KAREN MAGUIRE, JOHN WHITE, BETH ABESAMIS
4265 by Ms. Reed
ROBERT G. WILLIAMS, Page 4270
4273 by Ms. Reed
Checklist Item 2, UNE combinations, Page 4277
AMY STERN, KAREN MAGUIRE, DONALD ALBERT
Checklist Item 4, loops (generally), Page 4279
AMY STERN, THOMAS MAGUIRE, DONALD ALBERT, JOHN
WHITE, BETH ABESAMIS
4288 by Ms. Lichtenberg
4293 by Mr. Salinger
4295 by Mr. Oxman
4300 by Mr. McDonald
4304 by Ms. Lichtenberg
MINDA J. CUTCHER, JOHN BERARD, MICHAEL CLANCY,
SHERRY LICHTENBERG, ROBERT G. WILLIAMS
4310 by Ms. Hong

Page 4400

Record Requests
318 4246
319 4246
C 4277
D 4290
E 4297
F 4303
G 4319
H 4321